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Federal Communications Commission
Office of the Secretary

Amoco Chemical Company
Texas City, Texas
900 MHz, Trunked
WPAH364

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REQUEST FOR Waiver of Public Notice DA 01-1847

The Amoco Chemical Company of Texas City, Texas has operated a trunked radio system under the call sign WPAH364 for many years with periodic expansions to provide quicker access for plant operations personnel as required. The recent expansions of operations at Texas City as well as scheduled construction and maintenance activities have increased the system load to a burdensome extent necessitating this system upgrade and expansion. Amoco Chemical will utilize the expanded system to alleviate the system radio traffic load and to establish a more reliable communications platform for the personnel to safely operate the facilities at Texas City.

The Public Notice DA 01-1847 of August 2, 2001 set aside four (4) 900 MHz channels for the Industrial Telecommunications Association (ITA) and the Personal Communications Industry Association (PCIA) for the purposes of frequency coordination services for itinerant and other specialized operations. These channels were Nos. 398 and 399 from the Industrial/Land Transportation Category and channel Nos. 131 and 133 from the Business Category.

Amoco Chemical requests a grant of a waiver to the FCC Public Notice DA 01-1847 for the use of three 900 MHz channels as an addition to license WPAH364. As outlined above, the purpose of the channel expansion is to eliminate the channel congestion on the existing system and provide more reliable communications for the operation of the chemical plant, the adjoining refinery and the waterways that serve as the terminal port of finished petroleum and chemical products. These recent efforts to improve the communications at these facilities has included upgrades of the existing system hardware as well as expansion of the number of channels through Letters of Concurrence with existing BP Amoco licenses as well as Letters of Concurrence with other licensees along the upper Texas Gulf Coast.

Recent telephone conversations with FCC staff engineers has encouraged Amoco Chemical that this request will receive favorable attention. Channel 133 (897.6625/936.6625 MHz) has been licensed to Amoco as a mobile relay at the Texas City facility for many years under the call sign WPLV745. This license can be cancelled as part of the application process to modify WPAH364. Channels 398 and 399 (900.9750/939.9750 MHz and 900.9875/939.9875 MHz, respectively) have been licensed to Amoco Production for use in a 322 km radius offshore in the Gulf of Mexico at numerous production platforms as temporary base stations under the call sign WPKX928. Amoco Chemical stipulates that the use of these three requested channels at the Texas City facility under the call sign WPAH364 will produce no harmful interference to other incumbent licensees and engineering studies and Letters of Agreement for Operation have been executed between Amoco Chemical and incumbents in the upper Gulf coast of Texas.

Amoco Chemical is engaged in the processing and creation of chemical products from petroleum products and the adjoining refinery refines hydrocarbon feedstock into a variety of petroleum products which are moved from the BP Amoco Texas City Refinery through the Port of Texas City. The BP refinery produces a large percentage of the gasoline used in the United States. These three channels will afford the Amoco Chemical trunked system a more reliable communications platform to operate safely and efficiently at the Texas City facility.

A frequency search did not find any available 800 MHz or 900 MHz frequencies for this application.

Kathy Garrett
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Return Response to Waiver Request

The Amoco Chemical Company has operated a trunked radio system under the call sign WPAH364 at Texas City, Texas for many years (since prior to February of 1999) with periodic expansions and upgrades to provide quicker access for plant operations personnel as required. The recent expansions of operations at Texas City as well as scheduled construction and maintenance activities have increased the radio system load to a burdensome extent necessitating a system upgrade and expansion. Amoco Chemical will utilize the expanded system to alleviate the system radio traffic load and to establish a more reliable communications platform for personnel to safely operate the facilities at Texas City.

A number of options were considered to achieve a more reliable system. Among the basic options considered were:

- A switch to a new technology platform that would increase the number of virtual channels
- Extensive modifications to the existing 900 MHz trunked system
- Improvements and expansions to the existing 900 MHz trunked system

The switch to a new technology platform, while desirable from the standpoint of creating virtual channels from those already licensed under WPAH 364 would require the replacement of the entire system and would result in a severe disruption to safe operations at the facility. The acceptance of the proposal to conduct extensive modifications to the existing system required the use of several Part 24 900 MHz channels that were bundled with the hardware offer. The use of these Part 24 channels would have required extensive modifications and replacement of the antenna systems and would have lead to the segregation of the system subscribers as the existing units would not be capable of operating on both Part 90 and Part 24 channels in the same system, again serving to be a significant disruption to facility operations. Additionally, the switch to another frequency band proves to be burdensome as any system infrastructure working at 800 MHz, UHF or VHF high band or other bands for which Amoco Chemical would be eligible would require a number of channels that simply do not exist in the area of the Texas City facility. Last, there are a limited number of vendor products suitable for purpose in the environment of a chemical plant or refinery. With these options found to be less than favorable, Amoco began to explore the possibility of using the existing system hardware and software to achieve a more reliable system into the foreseeable future.

While there are certainly factors that lead to a conclusion that the Texas City system must eventually be replaced, there are circumstances and actions that have been employed to provide a careful transition to a new system. The actions, outlined below, are categorized as "short term", "near term" and "long term". Each of these actions will provide a measurable level of improvement in the radio system operations and performance at Texas City.

First, the short term actions provide for a cleanup of the existing system and address radio coverage problems to some extent. This has been accomplished and has lead to a measurable

improvement in system performance. The near term actions will provide yet another level of system performance improvement by distributing the load over the system channels with the use of talkgroup reengineering, gaining newer hardware and updated software and a renewed maintenance commitment from the radio vendor. With the radio system life extended for a few years by the short term and near term actions, BP will be in a position to begin to define the system of the future to address long term communication needs.

The action outline adopted by BP to achieve the improved system performance is highlighted as:

In the short-term, improve existing system performance in the short term by:

- Resolving observed interference issues on the system with the use of filtering devices
- Moving as many of the user PTTs as practical off the system to "talk-around" operation
- Reducing the number of PTT collisions by manipulating radio operating configurations
- Improving radio coverage with antenna system fixes and enhancements in the form of cavity devices that will reduce interference and improve radio performance
- Adopting usage policies to minimize the impact to system loading during emergencies

In the near-term, extend the life of the existing system in the near term by:

- Seeking the license of more frequencies to either extend the existing system life or for system replacement
- Redistributing the radio load on duplicate identical systems that back up each other with separate transmitter site locations away from the blast zone of the refinery
- Replacing select faulty or worn system components such as antennas and ancillary hardware or operating software to gain additional life in the system with the operational features and capabilities needed. [Unless otherwise accomplished in the short term actions described above.]

An effort to extend the life of the existing system would allow for eventually engineering a satisfactory long-term system solution, planning an expansion, delivery of equipment, training of the system users and an orderly transition to the new system configuration.

In the long-term as the business case allows replace the existing system by:

- Creating a specification that encompasses the functional requirements of BP Texas City radio users and takes advantage of the spectrum resources available to BP
- Developing an implementation strategy that allows for a migration with minimal disruption to operations at Texas City

As outlined above, the purpose of the channel expansion is to eliminate the channel congestion on the existing system and provide more reliable communications for the operation of the chemical plant, the adjoining refinery and the waterways that serve as the terminal port of finished petroleum and chemical products. Amoco Chemical requests a grant of a waiver to the FCC Public Notice DA 01-1847 for the use of three 900 MHz channels as an addition to license

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